

# PUBLIC SUBMISSION

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**Docket:** EPA-R03-OW-2010-0736

Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0561

Comment submitted by George W. Flathers, II, Owner/Proprietor, Meadowdean Farm

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## Submitter Information

**Submitter's Representative:** George W. Flathers, II

**Organization:** Meadowdean Farm

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## General Comment

RE: Docket ID#: EPA-R03-OW-2010-0736

Dear Sir or Madame:

I would like to register my strong opposition to the referenced EPA initiatives to establish federally-mandated TMDL backstop limits, because (1) they are predicated on a highly-flawed "Chesapeake Bay Model", which effectively throws out actual, ground-truthed data from Virginia simply because it doesn't fit within the EPA's "modeled" land use data; (2) the economic impacts of the mandates are a death sentence to a weakened agri-business sector in the region; (3) state- and county-level incentive and cooperative Best Management Practice (BMP) programs already encourage widespread improvements in proper water, land and nutrient management, at a level that would far-exceed the level of compliance that heavy-handed, bureaucrat-managed, federal oversight and regulation would achieve; and (4) the EPA's data and methodology for the estimating the cost of compliance is woefully inadequate and betrays a typical and fundamental Washington ignorance of the real world outside the beltway (the real world that produces the food that those same bureaucrats consume without a thought).

Sincerely,

George W. Flathers, II  
Owner/Proprietor  
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